

THE HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SUSTAINABLE FIBER TECHNOLOGIES
LLC, a Nevada limited liability company,

Plaintiff,

v.

DARBY KREITZ, an individual, ALLNORTH
CONSULTANTS LTD., a Canadian limited
company; ALLNORTH AMERICAS INC., a
Nevada corporation; RED LEAF FIBRE LTD.,
a Canadian limited company; and RED LEAF
PULP, LTD., a Canadian limited company,

Defendants.

CASE NO. 2:22-cv-00822-MJP

**STIPULATION AND ORDER FOR
THIRD EXTENSION OF THE TIME
FOR DEFENDANTS TO RESPOND TO
PLAINTIFF'S COMPLAINT**

**NOTE ON MOTION CALENDAR:
Wednesday, November 23, 2022**

Plaintiff Sustainable Fiber Technologies LLC ("Plaintiff") and defendants Darby Kreitz, Allnorth Consultants Ltd., Allnorth Americas Inc., Red Leaf Fibre Ltd., and Red Leaf Pulp, Ltd. (collectively, "Defendants"; Plaintiff and Defendants, collectively, the "Parties"), by and through their counsel of record, respectfully submit this Stipulation—and respectfully request that the Court enter the subjoined proposed order—for a third extension of the time for Defendants to respond to Plaintiff's Complaint.

1 1. WHEREAS, on June 12, 2022, Plaintiff filed the Complaint against Defendants in
2 the above-captioned action [Dkt. No. 1].

3 2. WHEREAS, on July 22, 2022, Defendants signed a Waiver of the Service of
4 Summons [Dkt. No. 9].

5 3. WHEREAS, on September 20, 2022, the Court granted the Parties' Stipulation and
6 Order to Extend Time for Defendants to Respond to Plaintiff's Complaint [Dkt. No. 15].

7 4. WHEREAS, pursuant to the Parties' cooperation and discussions, the Parties
8 participated in a full-day mediation session with Louis D. Peterson on September 22, 2022, and
9 their mediation efforts continued after September 22, 2022.

10 5. WHEREAS, on October 18, 2022, the Court granted the Parties' Stipulation and
11 Order for Second Extension of the Time for Defendants to Respond to Plaintiff's Complaint [Dkt.
12 No. 17].

13 6. WHEREAS, Defendants' deadline to respond to Plaintiff's Complaint is December
14 2, 2022.

15 7. WHEREAS, the Parties have reached a settlement but need time to draft and
16 execute settlement documents.

17 8. WHEREAS, the Parties intend to dismiss with prejudice this action by December
18 20, 2022.

19 9. WHEREAS, the Parties agree that a third extension of Defendants' deadline to
20 respond to the Complaint will further judicial and litigant efficiency, such as allowing the Parties
21 to draft and execute settlement documents.

22 10. WHEREAS, the requested extension is made in good faith and not for the purpose
23 of delay or other procedural advantage.

24 11. ACCORDINGLY, the Parties stipulate and respectfully request to extend
25 Defendants' deadline to respond to Plaintiff's Complaint to January 20, 2023. A proposed order
26 is subjoined herewith.
27

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD, on this 23rd day of November, 2022.

BUCHALTER

/s/ Bradley P. Thoreson

Bradley P. Thoreson, WSBA No. 18190

/s/ Jeffrey R. Kaatz

Jeffrey R. Kaatz, WSBA No. 49709

1420 Fifth Ave., Suite 3100

Seattle, WA 98101

Telephone: (206) 319-7052

Email: bthoreson@buchalter.com

Email: jkaatz@buchalter.com

/s/ Roger L. Scott

Roger L. Scott, *admitted pro hac vice*

/s/ J. Rick Tachè

J. Rick Tachè, *admitted pro hac vice*

18400 Von Karman., Ste 800

Irvine, CA 92612-0514

Telephone: 949-760-1121

Email: rscott@buchalter.com

Email: rtache@buchalter.com

Attorneys for Plaintiff Sustainable Fiber Technologies LLC

GOLDFARB & HUCK ROTH RIOJAS, PLLC

/s/ R. Omar Riojas

R. Omar Riojas, WSBA No. 35400

/s/ Kit W. Roth

Kit W. Roth, WSBA No. 33059

925 Fourth Avenue, Suite 3950

Seattle, WA 98104

Telephone: 206.452.0260

Facsimile: 206.397.3062

E-mail: riojas@goldfarb-huck.com

roth@goldfarb-huck.com

Attorneys for Defendants

ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED. Defendants' deadline to respond to Plaintiff's Complaint is extended to January 20, 2023.

DATED: November 28, 2022



THE HONORABLE MARSHA J. PECHMAN
United States District Court Judge

Presented by:

BUCHALTER

/s/ Bradley P. Thoreson

Bradley P. Thoreson, WSBA No. 18190

/s/ Jeffrey R. Kaatz

Jeffrey R. Kaatz, WSBA No. 49709

1420 Fifth Ave., Suite 3100

Seattle, WA 98101

Telephone: (206) 319-7052

Email: bthoreson@buchalter.com

Email: jkaatz@buchalter.com

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18400 Von Karman., Ste 800

Irvine, CA 92612-0514

Telephone: 949-760-1121

Email: rscott@buchalter.com

Email: rtache@buchalter.com

Attorneys for Plaintiff Sustainable Fiber Technologies LLC

GOLDFARB & HUCK ROTH RIOJAS, PLLC

/s/ R. Omar Riojas

R. Omar Riojas, WSBA No. 35400

/s/ Kit W. Roth

Kit W. Roth, WSBA No. 33059

925 Fourth Avenue, Suite 3950

Seattle, WA 98104

Telephone: 206.452.0260

Facsimile: 206.397.3062

E-mail: riojas@goldfarb-huck.com

roth@goldfarb-huck.com

Attorneys for Defendants